REMARKS

This Application has been reviewed in light of the Office Action mailed November 15, 2007. Claims 1, 3-8, 10-14 and 16-22 are pending in this Application. Claims 1, 3-8, 10-14 and 16-22 were rejected. Claims 2, 9 and 15 were previously cancelled without prejudice or disclaimer. Applicants respectfully request reconsideration and favorable action in this case.

Rejections under 35 U.S.C. § 102

Claims 1, 3-5, 8, 10-12, 14, 16-18, 21 and 22 were rejected by the Examiner under 35 U.S.C. §102(e) as being anticipated by U.S. Patent Application Publication No. 2007/0011283 by Kenneth Edgar Brown et al. (*"Brown"*). Applicants respectfully traverse and submit the cited art does not teach all of the elements of the claimed embodiment of the invention.

"A claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference." *Verdegaal Bros. v. Union Oil Co. of California*, 814 F.2d 628, 631, 2 U.S.P.Q.2d 1051, 1053 (Fed. Cir. 1987). Furthermore, "the identical invention must be shown in as complete detail as is contained in the ... claim." *Richardson v. Suzuki Motor Co. Ltd.*, 868 F.2d 1226, 1236, 9 U.S.P.Q.2d 1913, 1920 (Fed. Cir. 1989). Applicants respectfully submit that *Brown* cannot anticipate the rejected Claims because *Brown* does not show all the elements of the present Claims.

Independent Claim 1 is Allowable over Brown

Independent Claim 1 recites, among other limitations:

> **determining whether the one or more devices are compatible to operate with each other** by automatically comparing the discovered attributes with a predefined set of valid device attributes, the predefined set of valid device attributes specifying device attributes that are compatible with one another

Brown does not disclose determining whether one or more devices are compatible to operate with one another.

The Examiner argued that *Brown* discloses this limitation at p.3, para. 0025, ll 8-12. (See Office Action, page 3). The cited portion, however, never mentions **determining whether the one or more devices are compatible to operate with each other**. Rather, *Brown* states:

> The system administrator then selects one or more endpoint systems on the network for comparison against the model system. Differences between the model system and the selected endpoint systems are displayed on a graphical user interface.

(*Brown*, ¶ 0025, ll. 8-12).

In fact, *Brown* does not teach or disclose anything related to determining whether one or more devices are compatible to operate with each other. Rather, *Brown* intends to provide a simple way to "specify a desired system configuration, and to automatically update all systems to match the desired system configuration." (*Brown*, ¶ 0024, ll. 21-23). The model system mentioned in the portion cited by the Examiner is the "desired system configuration" mentioned here. There is no disclosure, teaching, or suggestion of:

> **determining whether the one or more devices are compatible to operate with each other** by automatically comparing the discovered attributes with a predefined set of valid device attributes, the predefined set of valid device attributes specifying device attributes that are compatible with one another

It is inappropriate to read *Brown*'s model configuration with automatic updates as disclosing the limitations of Independent Claim 1. For at least this reason, Independent Claim 1 is allowable over *Brown*.

For analogous reasons, Independent Claims 8 and 14 are likewise allowable. Because they depend from allowable Independent Claims, Dependent Claims 3-5, 10-12, 16-18, and 21 are likewise allowable.

Independent Claim 22 is Allowable over Brown

Independent Claim 22 recites, among other limitations:

> in response to the user input, automatically discovering **hardware attributes** of one or more of the devices in the network;

> automatically comparing the discovered **hardware attributes** with a predefined set of valid hardware attributes; and

> generating output data that indicates whether the discovered **hardware attributes** match the valid hardware attributes.

Brown does not disclose discovering hardware attributes or comparing discovered hardware attributes.

The Examiner argued that *Brown* discloses this limitation at p.3, para. 0025, ll 8-12. (See Office Action, page 3). The cited portion, however, never mentions **hardware attributes** at all:

> The system administrator then selects one or more endpoint systems on the network for comparison against the model system. Differences between the model system and the selected endpoint systems are displayed on a graphical user interface.

(Brown, ¶ 0025, ll. 8-12).

In fact, *Brown* does not teach or disclose anything related to determining **hardware attributes**. Rather, *Brown* intends to provide a simple way to "specify a desired system configuration, and to automatically update all systems to match the desired system configuration." *(Brown, ¶ 0024, ll. 21-23).* In fact, *Brown* goes on to state:

> The system administrator may then select certain endpoint systems for updating, and the system configuration manager then updates the selected endpoint systems to match the settings of the model system. The system configuration manager includes a configuration mapping mechanism to perform mapping of configuration information across platforms and to the model system.

(Brown, ¶ 0025, ll. 13-19).

An automated system configuration manager cannot update **hardware attributes** of a target system. It is clear, then, that the system of *Brown* only considers software system settings. There is no disclosure, teaching, or suggestion of:

> in response to the user input, automatically discovering **hardware attributes** of one or more of the devices in the network;
>
> automatically comparing the discovered **hardware attributes** with a predefined set of valid hardware attributes; and
>
> generating output data that indicates whether the discovered **hardware attributes** match the valid hardware attributes.

It is inappropriate to read *Brown*'s model configuration with automatic updates as disclosing the limitations of Independent Claim 22. For at least this reason, Independent Claim 22 is allowable over *Brown*.

Rejections under 35 U.S.C. §103

Claims 6, 7, 13, 19 and 20 were rejected under 35 U.S.C. §103(a) as being unpatentable over *Brown* in view of U.S. Patent No. 7,133,906 issued to Chuck Price et al. ("*Price*"). As explained above, Independent Claims 1, 8, 14 are allowable in their current forms. Because Claims 6 and 7 depend from Independent Claim 1, Claim 13 depends from allowable Independent Claim 8, and Claims 19 and 20 depend from allowable Independent Claim 14, Claims 6, 7, 13, 19 and 20 are likewise allowable.
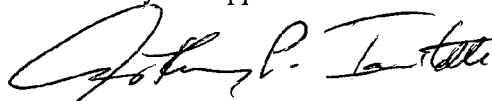
CONCLUSION

Applicants appreciate the Examiner's careful review of the application. Applicants have made an earnest effort to place this case in condition for examination and allowance. For the foregoing reasons, Applicants respectfully request reconsideration of the rejections and full allowance of Claims 1, 3-8, 10-14 and 16-22.

Applicants believe there are no fees due at this time, however, the Commissioner is hereby authorized to charge any additional fees or credit any overpayment to Deposit Account No. 50-2148 of Baker Botts L.L.P.

If there are any matters concerning this Application that may be cleared up in a telephone conversation, please contact Applicants' attorney at 512.322.2642.

Respectfully submitted,
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